



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CMP/AMC  
F. #2011R00414

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 18, 2014

By ECF

The Honorable Nina Gershon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Dunn, Hymowitz and Freeman  
Criminal Docket No. 11-683 (S-2)(NG)

Dear Judge Gershon:

The government respectfully submits the attached proposed Protective Order for all materials that the government intends to disclose to the defendants next week pursuant to 18 U.S.C. § 3500 (the "Section 3500 Material"). As the Court is aware, when the Court established the pretrial disclosure schedule, the parties agreed that the government would provide early disclosure of the Section 3500 Material on February 24, 2014 on the condition that the further dissemination of such material be prohibited pursuant to a protective order. Thus, the government respectfully requests that the Court enter the attached order prior to that date.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

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Encl.